



TUCAN comments on the Mayor of London's Clean Air Delivery Plan

[MD3400 Delivery Plan – Cleaning London's Air | London City Hall](#) August 2025

The Trade Union Clean Air Network (TUCAN) welcomes the publication of the GLA plan for Cleaning London's Air. We note:

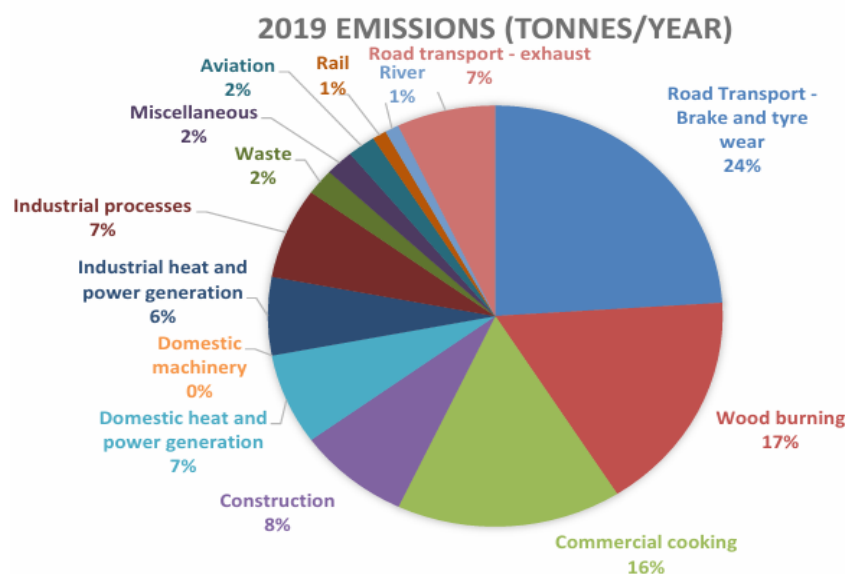
1. The ambition to '*ensure that London has the best air quality of any major city in the world, and to protect public health and minimise **inequalities.***'
2. The need for an increased '*focus on other sources, such as pollution from **construction and buildings.***'
3. The recognition that improving air quality is '*fundamentally about tackling **social injustice and health inequalities.***'

TUCAN response

We feel that the plan must reflect more accurately the main sources of air pollution and consequently one of the most at-risk groups. To this end we propose:

1. **The inclusion of 'occupational health' as well as public health.** This is consistent with the main sources of air pollution that are reflected in the chart below (Appendix 2, Page 2 [MD3400 - Appendix 2 - Delivery Plan - Cleaning London's Air - 08.07.25 \[CLEAN\] \(2\).pdf](#))

Sectors contributing to PM_{2.5} emissions in London



Source: [London Atmospheric Emissions Inventory 2019](#)

This shows that most emissions are linked to industrial processes and related work activities. 37% (Construction, Commercial cooking, Power generation and Industrial processes) are direct consequences of occupational activity. The 35% caused by transport emissions are often directly related to work activity. Even much of the 24% linked to domestic generation has a work activity component given the huge increase in working from home.

In other words, well over half of air pollution experienced in the capital is work-related. In the light of this to not make a single reference to occupational health seems to be a serious omission.

- 2. Include a specific reference to workers as a 'vulnerable and at-risk group.'** The plan rightly references groups that are more 'disproportionately impacted' than others. We suggest that workers directly employed in the sectors above, as well as those working nearby, fall into this category. We know that the degree of risk is determined largely by the amount of a pollutant x the length of time exposed to it. Consequently, workers who are more likely to be in much closer proximity to the source as well as for longer periods fall into the high-risk category.

In addition to this occupational risk some are then likely to have this exposure compounded by their public health exposure if they are on low incomes living in more polluted neighbourhoods.

3. Include guidelines for employers and businesses to act on occupational air pollution risks

We understand that in the absence of better legal requirements for employers to protect their workforce there are limits on what the GLA can do. We feel that including the following references in the Clean Air Delivery Plan would help businesses and their workforce to address occupational health concerns.

- a) Link to the Good Work Standard (GWS)** The Mayor has published a Good Work Standard for employers to sign up to which includes *'The organisation has considered climate adaptations and measures for their workplace to remain healthy and safe workplaces during extreme weather, extreme heat and to respond to the impacts of climate change on workers'* (Page 152) [The Mayor's Good Work Standard – Employer Guidance](#) This should be amended to include references to air pollution risks. Air pollution is a climate risk and can also combine with extreme heat to create additional hazards like ozone exposure. Foundation Level F5.8 reads *'The organisation is signed up to a weather- warning system to ensure they are notified ahead of any hot weather and have a plan in place to ensure workplace temperatures are at a comfortable level.'* Excellence Level E5.7 reads *'The organisation has considered climate adaptations and measures for their workplace to remain healthy and safe workplaces during extreme weather, extreme heat and to respond to the impacts of climate change on workers.'* Both levels should be adapted to include air pollution and air pollution warning systems.
- b) Air pollution risk assessments** – Even if employers do not register for the GWS they should still be expected to adopt air pollution standards and control measures. Add provisions to the plan that encourage construction employers and building owners to carry out climate risk assessments that include indoor and outdoor air pollution hazards.

- c) **Worker and union consultation** - Provisions that promote the right of workers and their unions to investigate climate risks, including air pollution, and to consultation with employers.
4. **Include trade unions as specific partners.** Appendix 1 refers to *'The delivery plan for this programme should recognise all the partners required to ensure success. This includes the GLA Group, London boroughs, businesses and other organisations, such as philanthropic, community and campaign groups.'* TUCAN feels that given the importance of the occupational health factor, highlighted above, it is imperative that trade unions are clearly defined. Unfortunately, by accident or design, unions are rarely mentioned in government and regional policy. Putting them into the *'other organisation'* category runs the risk of them not being included in the consultation and delivery stages.
5. **Indoor air pollution as a priority objective.** Appendix 1 fails to mention indoor air pollution as a priority. This is a serious emission. TUCAN has long argued that 'occupational' health needs to be prioritised along with 'public health'. Additionally, 'indoor' pollution needs to be prioritised along with 'outdoor' pollution. This view is reinforced by the Chief Medical Officer Report . This states clearly that *'A better understanding of how we can prevent and reduce indoor air pollution should now be a priority.'* [Chief Medical Officer's Annual Report 2022](#)

The plan does refer to *'reducing exposure in schools.'* This is welcome assuming that it is not confined to outside pollution impacting the school environment. Pupil safety is vital but can't be at the expense of ignoring staff safety. Although children's lungs are potentially more vulnerable than those of most adults there is also the need to factor in that school staff will often have a greater exposure due to length of time in the building and proximity to pollutants.

Follow up

TUCAN welcomes the opportunity to raise these points with the Deputy Mayor for the Environment and Energy. As members of the Healthy Air Coalition, we are anxious to ensure that similar initiatives are taken by the UK Government in other countries and regions. We look forward to contributing to the Mayor's Air Quality Summit in the Autumn of 2025 as part of an ongoing engagement around air pollution and other climate risks.

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